

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, JESSA SEEWALD,)
JINGER VUOLO, and JOY DUGGAR,)
PLAINTIFFS,)

VS.)

CITY OF SPRINGDALE, ARKANSAS;)
WASHINGTON COUNTY, ARKANSAS;)

KATHY O'KELLEY, in her Individual) CASE NO. 17-CV-05089-TLB
and Official Capacities; ERNEST)

CATE, in his Individual and)

Official Capacities; RICK HOYT,)

in his Individual and Official)

Capacities; STEVE ZEGA, in his)

Official Capacity;)

Does 1-10, Inclusive,)

DEFENDANTS.

ORAL AND VIDEOTAPED DEPOSITION OF

JINGER VUOLO

September 20, 2021

ORAL AND VIDEOTAPED DEPOSITION OF JINGER

VUOLO, produced as a witness at the instance of the
DEFENDANTS, and duly sworn, was taken in the
above-styled and numbered cause on the 20th day of
September, 2021, from 10:02 a.m. to 3:25 p.m., before
Tammie L. Foreman, CCR in and for the State of
Arkansas, RPR, CRR, reported by machine shorthand, via
audio-video conference, pursuant to the Federal Rules
of Civil Procedure.



1 A. No.

2 Q. Okay. So somewhere less than a month, but you
3 don't remember if you waited a day or two or a week or
4 two; is that accurate?

5 A. I don't remember.

6 Q. Okay. So at some point after these redacted
7 police disclosures, there was an interview on the
8 Megyn Kelly show. Do you recall that?

9 A. Yes.

10 Q. Okay. Had you read or looked at those redacted
11 police reports before the interview with Megyn Kelly?

12 A. Yes, I did.

13 MR. BLEDSOE: Object to the form.

14 Q. I'm sorry. Your answer was?

15 A. Yes.

16 Q. Okay. So whenever it was that you first saw
17 these redacted police reports or however you
18 discovered them or became aware of them in that way,
19 what do you recall seeing?

20 A. I recall seeing things that were supposed to be
21 kept or weren't supposed to be in the public.

22 Q. Okay. In the report that you viewed, did you
23 see your name?

24 A. No.

25 Q. Okay. Was the report that you saw less than 10

1 A. Products.

2 Q. What kind of products?

3 A. Hats, candles.

4 Q. Okay. And when did the company go out of
5 business?

6 A. This year.

7 Q. Okay. You and your husband wrote a book called
8 The Hope We Hold; is that correct?

9 A. Correct.

10 Q. Have you written any other books or published
11 materials?

12 A. Yes.

13 Q. What else have you written?

14 A. Growing Up Duggar.

15 Q. Okay. Anything else?

16 A. No.

17 Q. Okay. I can't recall which, but one of your
18 sisters indicated in her deposition that there was a
19 ghostwriter, to use the term, for Growing Up Duggar.
20 Do you recall that?

21 A. Yes.

22 Q. Did you and your husband have a ghostwriter on
23 The Hope We Hold?

24 A. Yes.

25 Q. Who was that person?

1 A. Bethany Mauger.

2 Q. Bethany. Can you spell that last name for me,
3 or try?

4 A. M-a-u-g-e-r.

5 Q. Okay. You indicated that you made some income
6 through brand partnerships. What brands have you
7 partnered with?

8 A. A lot.

9 Q. Do you remember any of them?

10 A. Yes.

11 Q. What would those be?

12 A. Skillshare, Bombay Hair. I'm trying to think.
13 Sorry.

14 Q. Sure.

15 A. I'm sorry.

16 Q. On those two, or as many as you remember, Bombay
17 Hair, I assume, is hair products?

18 A. Yes.

19 Q. Okay. What is Skillshare? Did I hear that
20 right?

21 A. Yes.

22 Q. What is that?

23 A. It's an online thing where people can learn
24 about, just, different things that they want to
25 explore, whether art, photography, cooking. And it

1 just has, like, online videos that people can sign up
2 for to watch and learn more. Yeah. Learning skills
3 online.

4 Q. That's a subscription service, it looks like?

5 A. Yes, it is.

6 Q. Okay. How did you -- let's talk specifically
7 with respect to these two brands. How did you partner
8 with them? What form did that take?

9 A. CEG.

10 Q. What is CEG?

11 A. It's where influencers can go to get
12 partnerships.

13 Q. Okay. CEG is, like, an agency?

14 A. Correct.

15 Q. Okay. So what did you do for Skillshare, for
16 instance?

17 A. I did a short Instagram story talking about the
18 program and how I learned photography from it, and
19 then I posted that on my Instagram.

20 Q. Okay. Same thing for Bombay Hair, did a social
21 media post about it?

22 A. Yes. Yes.

23 Q. And would that be true for all of your brand
24 partnerships? Is that how you partnered with them?

25 A. Most all of them, yes.

1 Q. Okay. So would you enter into a contract with
2 these brands before you did these posts? You pay me X
3 and I'll do a post or two or ten?

4 A. Most of the time, yes.

5 Q. Okay. What social media platforms are you on?

6 A. Facebook and Instagram and TikTok.

7 Q. Okay. Ballpark, what did you make last year,
8 all income for you? Not your husband, but for you.

9 A. Not exactly sure right now off the top of my
10 head.

11 Q. Yeah. More or less than 100,000?

12 A. More.

13 Q. Okay. More or less than 200,000?

14 A. Less.

15 Q. Okay. Is most of that income the social media
16 partnerships, or is most of that coming from somewhere
17 else?

18 A. Yes.

19 Q. Most of it coming from the social media?

20 A. Social media is the majority.

21 Q. Okay. I'm trying to recall your husband's
22 deposition. It's been a minute. Y'all live in
23 California, correct?

24 A. Correct.

25 Q. And where he pastors a church, if I recall; is

1 Q. Are you muted?

2 A. No.

3 Q. Oh, I'm sorry. What -- what was your answer? I
4 didn't hear.

5 A. I don't understand that question.

6 Q. Okay. I am going to represent that in your
7 lawsuit, you have made a claim that your privacy was
8 invaded by intrusion upon seclusion. How did the
9 events of this lawsuit intrude upon your seclusion?

10 MR. BLEDSOE: Object to the form.

11 A. I don't understand that question.

12 Q. Okay. Do you currently take any medications?

13 A. No.

14 Q. Have you taken --

15 MR. BLEDSOE: Hang on one sec. Jinger,
16 can you change the blinds? It looks like
17 you've got a mustache.

18 THE WITNESS: I'm sorry. I think the
19 lighting is changing here. Let me see if I
20 can do the blinds different. Hold on.

21 MR. BLEDSOE: You have a light mustache
22 there.

23 THE WITNESS: I fixed it.

24 MR. BLEDSOE: There you go.

25 Q. Have you taken any prescription or illegal drugs

1 MR. BLEDSOE: Object to the form.

2 A. I don't recall.

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1 Q. Which ones can you remember?

2 A. Wearing pants.

3 Q. Okay. He's of the belief that women should
4 never wear pants, right?

5 MR. BLEDSOE: Object to the form. Hang
6 on a minute. I need you to reask that
7 question. You said he doesn't believe that
8 women should never wear pants.

9 MR. OWENS: I'm sorry. I thought I said
10 ever.

11 Q. He doesn't believe that women should ever wear
12 pants, right?

13 MR. BLEDSOE: Object to the form.

14 A. That's his belief.

15 Q. The other way would have been a weird question.
16 If I asked it that way, I apologize.

17 Okay. Do you drink alcohol at all?

18 A. No.

19 Q. Some of your sisters -- well, let me back up.
20 My understanding is that there were two Duggar TV
21 shows, 19 and then 20 and Counting, followed by
22 Counting On would be the second show. Is that
23 accurate?

24 A. Yes.

25 Q. And those shows changed from the first to the

1 second fairly shortly after these redacted
2 disclosures, right?

3 A. Yes.

4 Q. Do you remember any of the meetings planning the
5 transition from the first show to the second show?

6 A. I remember there was a meeting.

7 Q. What do you remember about the meeting, if
8 anything?

9 A. I don't recall details of it. I was there, but
10 I was not really giving any input or a part of that.

11 Q. Were you -- you were a part of the second show,
12 weren't you?

13 A. Yes. Eventually.

14 Q. So at least -- eventually? You weren't at the
15 beginning?

16 A. I don't recall, Jill and Jessa, it was theirs.

17 Q. Yeah. In fact, there was a working title, maybe
18 an initial title, that had their names in it, right?

19 A. Yeah.

20 Q. Did you understand why their names were being
21 put in the title of the show?

22 A. No. No clue.

23 Q. Okay. Did you have any understanding as to why
24 your name wasn't?

25 A. No.

1 Q. Okay. Ultimately, I think they lost the names
2 and just called it Counting On, right?

3 A. Yes.

4 Q. Okay. And so as the show went on, my
5 understanding is that one or more of your sisters and
6 their new husbands sort of bailed out of the show and
7 stopped doing the show. Did you do that?

8 MR. BLEDSOE: Object to the form.

9 Q. Or did you stick with the show --

10 A. No.

11 Q. -- until the end? You stuck with the show until
12 the end, right?

13 A. Yes.

14 Q. Okay. Dr. Wynne quotes you on page 10 of his
15 report Bates stamped JD004829 as saying, quote, "I've
16 always cried and I cry about the same amount as I
17 always have. I'm a cryer," end quote. Is that a true
18 statement?

19 A. Yes.

20 Q. Okay. Other than the redacted disclosures in
21 this lawsuit, have you ever suffered emotional
22 distress before or since?

23 MR. BLEDSOE: Object to the form.

24 A. Can you repeat that, please?

25 Q. Sure. As I read your lawsuit, you claim that

1 the redacted disclosures in this case caused you
2 emotional distress and mental anguish. Have you ever
3 suffered emotional distress or mental anguish as a
4 result of any other events in your lifetime?

5 A. I don't know.

6 Q. Okay. Certainly you suffered emotional distress
7 and/or mental anguish when you were abused by your
8 brother, right?

9 A. Yes.

10 Q. Okay. And you suffered similarly when you had a
11 miscarriage, correct?

12 A. Yes.

13 Q. Okay. My wife and I have been through that as
14 well, so I completely understand that. Any other
15 events that have caused you emotional distress or
16 mental anguish in your life?

17 MR. BLEDSOE: Object to the form.

18 A. I don't know.

19 Q. Okay. Were you on the missions trip where the
20 security guard was murdered at night?

21 A. No.

22 Q. Okay. When your sister passed away, were you
23 old enough to sort of realize what was going on?

24 A. Yes.

25 Q. Did that cause you emotional distress or mental

1 anguish?

2 A. A little bit.

3 Q. Okay. I understand that your grandmother passed
4 away suddenly several years ago; is that correct?

5 A. Yes.

6 Q. Did that cause you emotional distress or mental
7 anguish?

8 A. I was sad.

9 Q. Okay. Does your book discuss your abuse by
10 Josh?

11 A. I don't say that, no.

12 Q. Okay. Does your book discuss the redacted
13 disclosures and this lawsuit?

14 A. No.

15 Q. Okay. Shouldn't the public be aware of a sexual
16 predator in their community who has sexually abused at
17 least five people?

18 MR. BLEDSOE: Object to the form.

19 A. Yes.

20 Q. Okay. Have you ever been diagnosed by a
21 physician with any mental or emotional health
22 problems?

23 MR. BLEDSOE: Object to the form.

24 A. I don't know.

25 Q. You don't know. Okay.

1 A. Not mental issue, no.

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 Q. How have Josh's scandals both in being on the
21 infamous Ashley Madison list and more recently being
22 charged with federal child pornography charges, how
23 have those impacted you?

24 MR. BLEDSOE: Object to the form.

25 A. I don't know.

1 A. I don't know a lot about her, but she's also
2 suffered abuse.

3 Q. I see. So you sought her out and she -- I guess
4 she told you she had been to see Colleen in Kentucky;
5 is that fair?

6 A. She knew Colleen.

7 Q. Okay. Her Twitter handle sort of bio says,
8 quote, "Wife, Mother, Follower of Christ, Advocate,
9 Educator, Speaker, Part of the Army that brought
10 Larry Nassar to Justice." Is that the
11 Rachael Denhollander that you're talking about?

12 A. Yes.

13 Q. Okay. Do you have any plans to go to any
14 counseling with your husband?

15 A. I don't know. Not right now.

16 Q. How about any plans to go to counseling with any
17 members of the Duggar family?

18 A. No.

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25 Q. Okay. Are you planning to go to see Colleen

1 A. I would say Barb Kohler. Barbara Kohler.

2 Q. Where does Barbara Kohler live?

3 A. She lives out in Thousand Oaks.

4 Q. Okay. How often do you get a chance to see her?

5 A. Weekly, if not more.

6 Q. Okay. Has it been difficult on you moving,
7 what, 1,500 miles away from your family?

8 A. I mean, I miss them like I would -- yeah,
9 anybody would moving away. But I'm also, like, okay.
10 It hasn't --

11 Q. I'm trying to recall, do any of your siblings
12 live out in California?

13 A. No. Not yet. No. No one does.

14 Q. You are recruiting, huh?

15 A. We're trying.

16 Q. I gotcha. On page 15 of the psychotherapist's
17 report, Bates stamped JD004834, under the quality of
18 life inventory section, Dr. Wynne says, quote,
19 "Jinger --" I'm sorry. Jinger -- I apologize. I read
20 that name wrong every time.

21 Quote, "Jinger presents as a basically
22 happy, content -- as basically happy, content, and
23 satisfied with life," quote. Would you agree with
24 that?

25 A. I would agree overall.

1 Q. Do you know if any of your siblings have been
2 contacted to testify either for or against Josh in
3 that case?

4 A. I don't know.

5 Q. I'm moving around on you again.

6 A. Okay.

7 Q. Hopefully trying to wrap this up quicker. So
8 Mr. Owens -- well, you and Mr. Owens talked about, you
9 know, some of the things that you do right now.
10 You've mentioned book club and Bible study and so on.
11 Can you just kind of walk me through a day in the life
12 of what your day looks like.

13 A. It kind of varies at this season because I have
14 a ten-month-old and a three-year-old, and so I'm home
15 with them. I'm so grateful to be able to be home with
16 them.

17 And so typically get up in the morning,
18 and I'll get up a little bit before them, read the
19 Bible for a bit, pray, and then get on with the day.
20 Get the girls up, get them breakfast. And then we
21 will typically do a lot of playing, reading time with
22 them. Then kind of have them do their own little play
23 time and nap time.

24 And then I'll go around, do projects
25 around the house. Sometimes if I do have partnerships

1 to, like, do videos for, then I'll record those. And
2 then it depends on the day because we are pretty
3 flexible. My husband has school. So some days, it's,
4 like, we'll do Hebrew studies in the evening together.
5 Not because I'm good at it, but he's in Hebrew class.
6 So we'll do flashcards.

7 And then we'll have dinner together. And
8 oftentimes, we'll go out on a family drive, go see a
9 site in LA. And then, yeah. I don't know. That's
10 our typical day. Put the kids to bed, relax, and play
11 a game of Uno.

12 Q. Good. Okay. You had mentioned partnerships. I
13 am going to bounce around. I'm going back to social
14 media because you had mentioned partnerships. How
15 many partnerships do you have right now?

16 A. How many right now? Well, it's not -- they're
17 not continual, like continuing. So it is -- the way
18 that works, they are random partnerships.

19 So if -- sometimes, you will have a block
20 of partnerships that it's, like, you're going to do
21 five of these. And a lot of those are the ones that
22 end up getting canceled. And then you'll have some
23 single ones that people don't want to be associated
24 with us because of all that stuff, and they will drop
25 out as well.

1 Q. Okay.

2 A. I've never been -- it's only been in, like, a
3 manager or someone else has done an occasional post.
4 But I haven't done that.

5 Q. Okay. Who does access -- which managers do have
6 access to your Facebook?

7 A. It would have been The Gift Shop.

8 Q. Okay.

9 A. Yeah.

10 Q. You mentioned another company earlier I thought.
11 I had written down CEG.

12 A. CEG was -- yeah. CEG, so I just went to them.
13 They didn't -- they're not -- like, they're a brand
14 company that was -- had -- they're an agency, I guess
15 is the word. They have brands that, if you just want
16 to get a brand deal quickly, you just go to them and
17 they set it up with influencers. You don't have to be
18 under them. So I was never under them. I just kind
19 of took one and off brand deals from them on occasion.

20 Q. Okay.

21 A. And I'm not working with them.

22 Q. You're not working with them?

23 A. No. I'm not working alongside them. I would
24 just take, like -- say, "Oh, yeah. I want to do this
25 one brand partnership." So they would -- they had

1 just a couple of offers. Every once in a while, they
2 would have a brand partnership for me, but I was never
3 working for them or under them. It was just a single,
4 like, oh, do just one partnership and be done.

5 Q. Is that how The Gift Shop operates?

6 A. No.

7 Q. How about Chad Gallagher? Do you work with
8 Chad Gallagher?

9 A. No.

10 Q. Have you personally worked with Chad Gallagher?

11 A. Yes, we did for a little bit.

12 Q. When was that?

13 A. Goodness, I don't remember the date.

14 Q. Since you've been married?

15 A. For a very short time. Then we split ways.

16 Q. Why did you decide to split ways?

17 A. We just wanted to go a different direction.

18 Q. What was the difference in the direction?

19 A. I don't know. Personality.

20 Q. Yeah.

21 A. Skills.

22 Q. When you say "skills," are you referring to
23 Mr. Gallagher's?

24 A. I'm just saying the direction that we were
25 going, we just wanted to go and have somebody who,

1 like, I don't know. Yeah. Different skills.

2 Different skills that he didn't have.

3 Q. Are there any activities -- Ms. Vuolo, are there
4 any activities that you once enjoyed prior to May of
5 2015 that you no longer enjoy now?

6 A. Going in public and not -- not -- not just
7 thinking about, oh, everybody knows what happened to
8 me. That's one thing, like, I love going out. I love
9 traveling, meeting people. But it just kind of -- it
10 kind of is something that is harder because it's like
11 that deep pain of just knowing everybody knows what
12 happened to me. It's difficult.

13 Q. Anything else that you can think of?

14 A. I don't know. But it's -- it has been tough.

15 Q. Okay. And I apologize again. I'm bouncing
16 around on you. So when you were talking about you
17 have on Instagram those words are caught? Are those
18 posts then deleted? Are they stored somewhere? Where
19 do those posts that get blocked go?

20 A. I don't even know. I'd have to look that up to
21 see. I don't know how that works. But whenever --
22 all I know is they don't show up on my feed. So you
23 can -- if you look at our posts, like, on Instagram,
24 there will be none of those words in there.

25 Q. Okay.

1 A. It just -- it must just take them out, I don't
2 know, before it puts them up.

3 Q. Is there anything within -- I'm not familiar
4 with this feature at all, so just bear with me. Is
5 there anything within your Instagram account where it
6 shows you that it has captured it? Like a metric that
7 it has said we --

8 A. I don't know.

9 Q. -- have blocked 10 of your posts today?

10 A. I don't know. You'd have to talk to Instagram.
11 I don't know.

12 Q. I'm talking about from your side, do you see
13 that anywhere in your account settings?

14 A. I don't know. I don't know.

15 Q. Okay. Are you in discussions to do any further
16 reality television?

17 A. No. No.

18 Q. Do you want to do any more reality television?

19 A. I have no clue.

20 Q. You're not opposed to it?

21 A. I don't know.

22 Q. Do you know Ernest Cate? Have you ever met
23 Ernest Cate?

24 A. No.

25 Q. I asked you two questions in one. I'm so sorry.

1 Do you know Ernest Cate?

2 A. No.

3 Q. And have you ever met Ernest Cate?

4 A. No.

5 Q. Okay. Same question for retired

6 Chief Kathy O'Kelley; do you know her?

7 A. I don't know.

8 Q. You don't know if you know her?

9 A. No. I don't know her.

10 Q. Okay. What do you know about Kathy O'Kelley?

11 A. I can't recall.

12 Q. Well, as you sit here, just tell me what you can
13 recall about Kathy --

14 A. I can't recall anything.

15 MR. DANIELS: Jinger, if you've heard
16 anything from any of your attorneys about
17 any of these defendants, that's privileged
18 information.

19 A. Yeah. I can't recall.

20 Q. And I don't want to know anything, just so we'll
21 know -- just so we're all -- I agree with your
22 counsel.

23 A. I don't know.

24 Q. Let me just say this real quick. I don't want
25 to know anything that your lawyers have told you. I'm

1 not going to ask you any questions about anything that
2 your lawyers have told you, so we'll just -- just so
3 you'll know, I'm not asking for that, wouldn't ask for
4 that. So...

5 Have you ever been told that
6 Kathy O'Kelley is a lesbian?

7 A. No.

8 MR. DANIELS: Object to form.

9 Q. Have you ever been told --

10 A. No.

11 MR. DANIELS: Hold on, Jinger.

12 A. I'm sorry. I can't -- I thought you already
13 trying to -- you already asked the question, so I'm
14 sorry I didn't hear.

15 Q. You're just fine. Have you ever been told that
16 Kathy O'Kelley had an agenda that included release of
17 this report?

18 A. I don't know.

19 Q. I guess I don't --

20 A. I don't recall. I don't recall any -- I don't
21 recall.

22 Q. Do you believe that Kathy O'Kelley had an
23 agenda?

24 A. I don't recall.

25 Q. No, I'm just asking you, as you sit here right

1 now --

2 A. No. I don't know.

3 Q. Let me get my question out. It's hard because
4 the court reporter is taking down what we're saying,
5 so let me just ask this question.

6 Do you believe, as you sit here today,
7 that Kathy O'Kelley had an agenda to harm you?

8 MR. DANIELS: Object to form. And.

9 Jinger, again, anything you've heard
10 from any of your attorneys is privileged
11 information.

12 Q. And I'm not asking you about what you've heard.
13 I'm asking you, as you sit here today, do you believe
14 that Kathy O'Kelley had an agenda to harm you?

15 MR. DANIELS: Object to form.

16 Again, if your belief is based on
17 anything you've learned from your attorneys,
18 Jinger, that's privileged information. Go
19 ahead and answer if you can.

20 A. I don't know.

21 Q. Do you recall when your parents appeared on
22 Megyn Kelly in June of 2015?

23 A. Yes.

24 Q. Do you recall in that interview that your
25 parents said that they believed that there was an

1 questions with regard to Ernest Cate.

2 A. Okay.

3 Q. Do you have any information that you believe
4 Ernest Cate meant to harm you?

5 A. I don't know.

6 Q. As you sit here today, do you believe that
7 Ernest Cate meant to harm you?

8 MR. BLEDSOE: Object to the form.

9 A. I don't know.

10 Q. As you sit here today, do you have any evidence
11 that Mr. Cate meant to harm you?

12 MR. BLEDSOE: Object to the form.

13 A. I don't know.

14 Q. And same question with respect to
15 Chief O'Kelley. As you sit here today, do you have
16 any evidence that Chief O'Kelley meant to harm you?

17 A. I don't know.

18 MR. BLEDSOE: Object to the form.

19 A. I don't know.

20 Q. We've been going now for about an hour and a
21 half. I think I probably have about 20 or 30 more
22 minutes. I'm happy to keep going. But Ms. Vuolo, if
23 you'd like a break, I'm just getting ready to bounce
24 to another topic. If you would like to take a break.

25 A. Let's just roll through.

1 Q. Okay. Let me go back to the questions about
2 Officer Cate and Chief O'Kelley. What do you believe
3 that Chief O'Kelley did to harm you?

4 A. I don't know.

5 Q. Same question with respect to Ernest Cate, what
6 do you believe that Mr. Cate did to harm you?

7 A. I don't know.

8 Q. Same thing with respect to City of Springdale,
9 what do you believe that the City of Springdale did to
10 harm you?

11 A. I don't know.

12 Q. Ms. Vuolo, there was -- Mr. Owens mentioned it
13 earlier, and it's been referred to through the course
14 of these depositions as a teaser article, that there
15 was an article in In Touch that referenced molestation
16 by your brother prior to the release of the reports by
17 Springdale or Washington County. Are you aware of
18 that?

19 A. I -- I think I had heard something about that,
20 but I was not aware of it. Like, I don't remember
21 seeing that.

22 Q. Okay. Did you become aware of that before the
23 release of the reports by Springdale or Washington
24 County?

25 A. I don't know. I don't remember.

1 A. I don't know. She was a grandma.

2 Q. She's a grandma?

3 A. Yeah. In my mind, but I don't know.

4 Q. Say that one more time.

5 A. I said in my mind is what I think, but I don't
6 know.

7 Q. Where have you seen her before?

8 A. I think she's the Holts' grandma, but I don't
9 know.

10 Q. Why do you think it was the Holt grandmother
11 that --

12 A. I don't know.

13 Q. That -- let me get my question out. It's a
14 weird -- it's not a natural conversation. Like, I'm
15 sorry. I can appreciate that. But let me just get my
16 question out.

17 Why do you believe that it could be a
18 Holt grandmother that contacted The Oprah Show?

19 A. Because that's what I think I had heard from
20 somebody, whoever told me.

21 Q. Okay. Let me talk for just a minute with you
22 about The Megyn Kelly Show. You did not participate
23 in The Megyn Kelly Show, correct?

24 A. Not at all.

25 Q. Why not?

1 A. I didn't want to.

2 Q. Okay. Were you asked to?

3 A. I don't recall. I don't recall --

4 Q. Go ahead.

5 A. I don't recall if I was ever asked to, but I
6 didn't want to.

7 Q. Do you know if you were given the option to?

8 A. I don't even know. I don't even recall --

9 Q. Okay.

10 A. -- what happened at that time. I know I didn't
11 want to.

12 Q. Did you recall any conversations with either
13 your sister Jessa or your sister Jill about their
14 going on The Megyn Kelly Show?

15 A. I remember they said they were going to go on
16 it, but I don't remember any conversations we had.

17 Q. Do you recall being concerned that they were
18 going to go on the show?

19 A. I don't remember what I was feeling at that
20 moment.

21 Q. Did you have any conversations with
22 Chad Gallagher about appearing on The Megyn Kelly
23 Show?

24 A. No.

25 Q. Did you talk to -- was it your parents? Did you

1 talk to your parents about it?

2 A. No. Not about -- no, not about me going on.
3 They said they were going to go on, but I didn't have
4 a conversation about that, that I can remember. No.

5 Q. Okay. Ms. Vuolo, did anybody ever say to you
6 specifically that they knew that you were one of the
7 victims identified in the redacted police report?

8 A. I don't recall. To my face? I don't recall.

9 Q. How about online?

10 A. Online, yes.

11 Q. Okay. Where online?

12 A. I don't recall the exact articles.

13 Q. Have you ever confirmed publicly -- prior to the
14 filing of this lawsuit in 2017, did you ever confirm
15 publicly that you were a victim?

16 A. No.

17 MS. KENDALL: If we could maybe take --
18 I think I'm about to wrap up. If we could
19 maybe just take about a five-minute break
20 and let me get my notes in order, and then
21 we can come back on and let y'all know if I
22 have any more questions.

23 MR. BLEDSOE: Jinger, do you need 10 to
24 check on your baby or anything?

25 THE WITNESS: That would be great